

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JASON GOODMAN,
Plaintiff,

v.

CHRISTOPHER ELLIS BOUZY, et al.,
Defendants.

Case No. 1:21-cv-10878

**DEFENDANTS BENJAMIN WITTES' AND NINA JANKOWICZ'S REPLY
IN SUPPORT OF THEIR MOTION FOR RECONSIDERATION
BASED ON NEW EVIDENCE**

Based on a video that Plaintiff Jason Goodman created after the Court's May 8, 2023 Report and Recommendation, ECF No. 203, Defendants Benjamin Wittes and Nina Jankowicz (together, "Movants") have moved the Court to reconsider its recommendation denying attorneys' fees and costs as a sanction for Plaintiff's harassing litigation tactics. *See* ECF Nos. 208 & 209. Plaintiffs' opposition to that Motion, ECF No. 216, does not respond to Movants' arguments or raise any legitimate basis for why the Court should not reconsider its decision on fees. Instead, Plaintiff has used his opposition brief as an opportunity to (once again) recount a series of offensive and false conspiracy theories, none of which has any bearing on the Motion for Reconsideration. And while Plaintiff claims that Movants somehow have attempted to mislead the Court about the content of the video at issue, the video speaks for itself and Plaintiff's own brief and the transcript he attached as Exhibit A confirm that he made all of the statements at issue.

For the foregoing reasons and those set forth in their opening Motion, Movants therefore respectfully request that the Court reconsider the portion of its Report and Recommendation

denying their request for an award of attorneys' fees and costs.

Dated: June 5, 2023

Respectfully submitted,

/s/ Elizabeth C. Lockwood

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of June, 2023, I caused true and correct copies of the foregoing Reply to be served electronically via ECF on the following:

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I additionally certify that on the 5th day of June, 2023, I caused true and correct copies of the foregoing Reply to be served via email and U.S. Mail First Class on the following:

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By: /s/ Elizabeth Lockwood